REMARKS

Claims 1-30 are pending. Claims 1, 15, 27, and 30 have been amended. No new matter has been introduced. Reexamination and reconsideration of the present application are respectfully requested.

In the September 17, 2003 Office Action, the Examiner objected to FIGS. 2, 5, 6, 7, and 9 for having margins that were too small and lines that were not dark enough. Applicants have amended these drawings as shown in red to increase the margins and darken the lines per the Examiner's request, and believe the drawings to be allowable. Applicants have also attached substitute formal drawings for FIGS. 2, 5, 6, 7, and 9.

In the September 17, 2003 Office Action, the Examiner rejected claims 1-30. The Examiner rejected claims 1-30 under 35 U.S.C. §112, ¶1, for containing language which the Examiner stated lacked support in the specification. Specifically, the Examiner stated that the term "local area network" in the claims was not adequately described in the specification. Applicants have amended the claims and replaced "local area network" with "computer network." Support for the limitation "computer network" may be found at, for example, page 7, lines 14-15. Accordingly, applicants respectfully submit that the Examiner's rejection of claims 1-30 under 35 U.S.C. §112, ¶1 should be withdrawn.

The Examiner rejected claims 1, 5, 6, 10, 15, 19, and 30 under 35 U.S.C. §103(a) as being obvious in view of a combination of U.S. patent number 6,263,387 to Chrabaszcz ("Chrabaszcz") and U.S. patent number 5,867,730 to Leyda ("Leyda"). Claims 27 and 28 were rejected under 35 U.S.C. §103(a) as being obvious over Chrabaszcz in view of U.S. Patent No. 6,301,012 to White ("White"). Claim 29 was

rejected under 35 U.S.C. §103(a) as being obvious over Chrabaszcz in view of a combination of White and applicants' Admitted Prior Art ("APA"). Claims 2, 3, 11, 16, 17, and 22 were rejected under 35 U.S.C. §103(a) as being obvious over Chrabaszcz in view of a combination of Leyda and U.S. Patent No. 5,822,565 to DeRosa Jr. et al. ("DeRosa"). Claims 4 and 18 were rejected under 35 U.S.C. §103(a) as being obvious over Chrabaszcz in view of Leyda, DeRosa, and White. Claims 7-9, 12-14, 20, 21, and 23-26 were rejected under 35 U.S.C. §103(a) as being obvious over Chrabaszcz in view of a combination of Leyda, DeRosa, and APA. These rejections are respectfully traversed.

Embodiments of the present invention relate to a method of configuring a computer for installation of a peripheral device. A print server is prepared to retrieve a first device identification from a memory of the peripheral device. The print server, the peripheral device, and the computer are connected via a computer network. The print server and the peripheral device are directly connected to the computer, and the peripheral device is indirectly connected to the computer. The first device identification in compared to device names on a list of names associated with device drivers, and the list and the drivers are stored in a memory of the computer. An associated driver is selected for use if the first device identification matches one of the names. At least a portion of a routine for the preparing, comparing, and selecting operations is stored in a memory of the computer.

Independent claim 1, as amended, recites (with emphasis added):

> 1.   A method of configuring a computer for installation of a peripheral device, the method comprising:
> preparing a print server to retrieve a first device identification from a memory of the peripheral device, the print server, the peripheral device, and the computer being connected via a computer network, **wherein the print server**

and the peripheral device are directly connected to the computer, and the peripheral device is indirectly connected to the computer;

comparing the first device identification to device names on a list of names associated with device drivers, the list and the drivers being stored in a memory of the computer; and

selecting for use an associated driver if the first device identification matches one of the names, **wherein at least a portion of a routine for the preparing, comparing, and selecting operations is stored in a memory of the computer**.

The Examiner stated that Chrabaszcz teaches preparing a server to retrieve a first device identification from a memory of a peripheral device, where the server, the peripheral device, and the computer are connected via a local area network, and the computer is connected to the peripheral device via a local area network. The Examiner also states that "Chrabaszcz teaches [a] print server", in the third line of the first paragraph below the "Response to Arguments" section on page 14 of the Office Action.

Applicants respectfully disagree with the Examiner. Applicants note that the Examiner admitted on page 4, line 1 of the Office Action that "Chrabaszcz does not teach a print server". On the same page, the Examiner states the "Chrabaszcz teaches a server," but also states that the server could be a print server. The Examiner argued that the Abstract and Col. 6 teach the server. Applicants have reviewed the passages of Chrabaszcz cited by the Examiner (i.e., those from the Abstract and from cols. 6, 7, and 11), but have found no references whatsoever to use of a "print server" or even a "server."

Moreover, applicants note that even assuming arguendo that Chrabaszcz did disclose use of a print server (which it does not), Chrabaszcz does not disclose, teach, or suggest a method of configuring a computer for installation of a peripheral device, including preparing a print server to retrieve a first device identification from a memory of the peripheral device, where the print server, the peripheral device, and the computer

are connected via a computer network, *the print server and the peripheral device are directly connected to the computer, and the peripheral device is indirectly connected to the computer.* This is a significant distinction over a mere network having a print server. Specifically, according to claim 1, as amended, the computer is configured for installation of a peripheral device even though the peripheral device is only indirectly connected to the computer (i.e., there is no direct connection). Therefore independent claim 1, as amended, distinguishes over distinguishes over Chrabaszcz.

Independent claim 1 further distinguishes over Chrabaszcz. Specifically, independent claim 1, as amended, further specifies that the first device identification is (a) *compared* to device names on a list of names associated with device drivers, the list and the drivers being stored in a memory of the computer; and (b) an associated driver is *selected* for use if the first device identification matches one of the names, *where at least a portion of a routine for the preparing, comparing, and selecting operations is stored in a memory of the computer.*

Chrabaszcz does not disclose such a routine or that the routine is stored in a memory of the computer. According to previous installation methods, an installation routine would normally be stored directly in the print server itself, and the memory of the computer would <u>not store</u> at least a portion of the routine. By storing at least a portion of the routine in a memory of the computer, it is much easier for the user to monitor the installation than would be possible if the routine was instead only installed on the print server. Therefore, independent claim 1, as amended, distinguishes over Chrabaszcz.

Leyda does not make up for the deficiencies of Chrabaszcz. The Examiner stated that Leyda discloses comparing a first device identification to device names on a

list of names associated with device drivers, where the list and the drivers are stored in a memory of the computer, and selecting an associated driver for use if the first device identification matches one of the names.

However, Leyda does not disclose, teach, or suggest a method of configuring a computer for installation of a peripheral device, including preparing a print server to retrieve a first device identification from a memory of the peripheral device, where the print server, the peripheral device, and the computer are connected via a computer network, *the print server and the peripheral device are directly connected to the computer, and the peripheral device is indirectly connected to the computer.* Moreover, Leyda does not disclose, teach, or suggest that the first device identification is (a) *compared* to device names on a list of names associated with device drivers, the list and the drivers being stored in a memory of the computer; and (b) an associated driver is *selected* for use if the first device identification matches one of the names, *where at least a portion of a routine for the preparing, comparing, and selecting operations is stored in a memory of the computer.* Therefore, independent claim 1, as amended, distinguishes over Leyda, alone or in combination with Chrabaszcz.

White does not make up for the deficiencies of Chrabaszcz and Leyda. The Examiner stated that White discloses preparing a print server to determine if a current installation of the print drivers is a first installation of the printer drivers, and installing the printer drivers in the computer based on the information associated with the first installation.

However, White does not disclose, teach, or suggest a method of configuring a computer for installation of a peripheral device, including preparing a print server to

retrieve a first device identification from a memory of the peripheral device, where the print server, the peripheral device, and the computer are connected via a computer network, *the print server and the peripheral device are directly connected to the computer, and the peripheral device is indirectly connected to the computer.* Moreover, White does not disclose, teach, or suggest that the first device identification is (a) *compared* to device names on a list of names associated with device drivers, the list and the drivers being stored in a memory of the computer; and (b) an associated driver is *selected* for use if the first device identification matches one of the names, *where at least a portion of a routine for the preparing, comparing, and selecting operations is stored in a memory of the computer.* Instead, White discloses that installation routines for installing a printer are stored entirely within a memory of a print server. [Col. 3, lines 16-26.] Therefore, independent claim 1, as amended, distinguishes over White, alone or in combination with Chrabaszcz and/or Leyda.

Applicants' APA does not make up for the deficiencies of Chrabaszcz, Leyda, and White. The Examiner stated that applicants' APA discloses device identifications conforming to an IEEE 1284 signaling standard.

However, the APA does not disclose, teach, or suggest a method of configuring a computer for installation of a peripheral device, including preparing a print server to retrieve a first device identification from a memory of the peripheral device, where the print server, the peripheral device, and the computer are connected via a computer network, *the print server and the peripheral device are directly connected to the computer, and the peripheral device is indirectly connected to the computer.* Moreover, the APA does not disclose, teach, or suggest that the first device identification is (a)

compared to device names on a list of names associated with device drivers, the list and the drivers being stored in a memory of the computer; and (b) an associated driver is *selected* for use if the first device identification matches one of the names, *where at least a portion of a routine for the preparing, comparing, and selecting operations is stored in a memory of the computer.* Therefore, independent claim 1, as amended, distinguishes over the APA, alone or in combination with any of Chrabaszcz, Leyda, and White.

DeRosa does not make up for the deficiencies of Chrabaszcz, Leyda, White, and the APA. The Examiner stated that DeRosa discloses different string identifiers being produced by a system for different devices based on vendors and platforms.

However, the DeRosa does not disclose, teach, or suggest a method of configuring a computer for installation of a peripheral device, including preparing a print server to retrieve a first device identification from a memory of the peripheral device, where the print server, the peripheral device, and the computer are connected via a computer network, *the print server and the peripheral device are directly connected to the computer, and the peripheral device is indirectly connected to the computer.* Moreover, DeRosa does not disclose, teach, or suggest that the first device identification is (a) *compared* to device names on a list of names associated with device drivers, the list and the drivers being stored in a memory of the computer; and (b) an associated driver is *selected* for use if the first device identification matches one of the names, *where at least a portion of a routine for the preparing, comparing, and selecting operations is stored in a memory of the computer.*

Therefore, independent claim 1, as amended, distinguishes over DeRosa, alone

or in combination with any of Chrabaszcz, Leyda, White, and the APA.

Claims 2-14 depend, directly or indirectly, from independent claim 1, as amended, and therefore also distinguish over Chrabaszcz, Leyda, White, DeRosa, and the APA, alone or in combination, for the same reasons as those set forth above with respect to independent claim 1, as amended. Independent claims 15, 27, and 30, all as amended, each recite limitations similar to those of independent claim 1, as amended, and therefore also distinguish over Chrabaszcz, Leyda, White, DeRosa, and the APA, alone or in combination, for reasons similar to those set forth above with respect to independent claim 1, as amended. Claims 16-26 depend, directly or indirectly, from independent claim 15, as amended, and therefore also distinguish over Chrabaszcz, Leyda, White, DeRosa, and the APA, alone or in combination, for the same reasons as those set forth above with respect to independent claim 15, as amended. Claims 28 and 29 depend, directly or indirectly, from independent claim 27, as amended, and therefore also distinguish over Chrabaszcz, Leyda, White, DeRosa, and the APA, alone or in combination, for the same reasons as those set forth above with respect to independent claim 27, as amended.

Accordingly, applicants respectfully submit that the rejection of claims 1-30 under 35 U.S.C. §103(b) should be withdrawn.

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Applicants believe that the foregoing amendments place the application in condition for allowance, and a favorable action is respectfully requested. If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call either of the undersigned attorneys at the Los Angeles telephone number (213) 488-7100 to discuss the steps necessary for placing the application in condition for allowance should the Examiner believe that such a telephone conference would advance prosecution of the application.

Respectfully submitted,

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